

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NETLIST, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 2:22-cv-203-JRG
)	
MICRON TECHNOLOGY, INC.;)	JURY TRIAL DEMANDED
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

DECLARATION OF YANAN ZHAO IN SUPPORT OF
PLAINTIFF NETLIST, INC.'S REPLY IN SUPPORT OF ITS MOTION
TO STRIKE DEFENDANTS' SEPTEMBER 14, 2023 SUPPLEMENTAL
RESPONSE TO INTERROGATORY NO. 1 (DKT. 184)

I, Yanan Zhao, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and the State Bar of Texas and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Plaintiff Netlist, Inc.’s Reply in Support of its Motion to Strike Defendants’ September 14, 2023 Supplemental Response to Interrogatory No. 1 (Dkt. 184). I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 14** is a true and correct excerpted copy of the transcript of the deposition of Boe Holbrook, dated August 30, 2023.

3. Attached as **Exhibit 15** is a true and correct excerpted copy of the transcript of the deposition of Ralph Kim, dated September 27, 2023.

4. Attached as **Exhibit 16** is a true and correct excerpted copy of the transcript of the deposition of Dave Wilson, dated September 27, 2023.

5. Attached as **Exhibit 17** is a true and correct copy of a letter from Netlist Counsel to Micron Counsel dated June 2, 2023.

6. Attached as **Exhibit 18** is a true and correct copy of email correspondence between Counsel for Netlist, Micron, and third-party Renesas between June 19 and September 19, 2023.

7. Attached as **Exhibit 19** is a true and correct excerpted copy of the transcript of the claim construction hearing in this action, held on July 26, 2023.

8. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 13, 2023, in Los Angeles, California.

By */s/ Yanan Zhao*

Yanan Zhao